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USDOC FOR 532/OEA/M. NICKSON-D/JAY HATFIELD  
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USDOC FOR 4530/MAC/ANESA/OSA  
ICE HQ FOR STRATEGIC INVESTIGATIONS  
STATE FOR EB/ESP

E.O. 12958: N/A

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SUBJECT: EXTRANCHECK: PRE-LICENSE CHECK: TITAN ENGINEERS, BANGALORE,  
LICENSE NO. D388819

REF: USDOC 02523

11. Unauthorized disclosure of the information provided below is prohibited by Section 12(c) of the Export Administration Act.

12. On May 6, 2008, Export Control Officer (ECO) Paul Cushman and BIS FSN Shailendra Srivastava conducted a Pre-License Check (PLC) at the company formerly known as Titan Engineers, Bangalore.

13. BIS requested a PLC at Titan Engineers, a private sector company located at 558, 52nd Cross, 10th Main Road, III Block, Rajajinagar, Bangalore. Titan Engineers was listed as the ultimate consignee for Nextel 312 Woven Ceramic Fabric (style AF-11) controlled under ECCN: 1C010. The license applicant is 3M Corporation of St Paul, Minnesota.

14. ECO and FSN Srivastava met with Mr. V. Sethuram, proprietor, and Mr. D. Prashanth.

15. The meeting was held in the company conference room. Mr. Sethuram was aware of some BIS regulations. However, this was the first visit by BIS officials to his company. He stated that Titan Engineers was dissolved on December 31, 2007 and Lakshmi Innovations was launched in its place on January 1, 2008. The impetus for this name change was that several other firms in Bangalore were using some variation of "Titan Engineers" in their name. He stated that the 3M Corporation has been notified of the name change. Mr. Sethuram provided copies of relevant documents confirming the dissolution of Titan Engineers and the incorporation of Lakshmi Innovations.

16. Mr. Sethuram stated that the product on order would be sold to ISRO Satellite Centre for use in various Indian National Satellites including the Indian Regional Navigational Satellite System. He explained that this specialty fabric is prized for its strength, light weight, and thermal capacity. Mr. Sethuram provided copies of the 3M Quotation, Acceptance Order from ISRO Satellite Centre, Titan Engineers Purchase Order, and two End-Use Certificates supplied by ISRO Satellite Centre.

17. Established in 1991 as Titan Engineers, Lakshmi Innovations is a small, private firm which serves as a supplier to the aerospace industry in India. In addition, this company serves as a distributor of industrial tools and construction equipment.

18. Recommendation: Lakshmi Innovations appears to be a suitable recipient of this controlled technology. Lakshmi Innovations cooperated fully with the BIS team, has a legitimate customer for the commodity and understands its responsibilities with respect to the Export Administration Regulations.

MULFORD